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VIA ELECTRONIC FILING

The Honorable Peggy Kuo, Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York

Re: *Bell v. CVS Pharmacy, Inc.*, Case No.: 1:21-cv-06850-HG-PK
*Joint Letter Motion to Adjourn Settlement Conference and Stay Case Pending
Mediation*

Dear Judge Kuo:

Plaintiff Monique Bell and Defendant CVS Pharmacy, Inc. (the “Parties”) jointly write to request an adjournment of the upcoming settlement conference and a stay of the proceedings pending private mediation. The Parties have recently agreed to privately mediate this matter and will endeavor to schedule the mediation as soon as practicable.

The settlement conference is currently scheduled to occur on August 23, 2022, and the Parties have been ordered to submit settlement statements by August 12, 2022. (*See* Dkt. at May 11, 2022.) A fully-briefed Motion for Judgment on the pleadings is also pending. (*See* Dkt. at 41-45.) To allow the Parties to focus their resources and attention on a potential resolution, and to preserve judicial resources, the Parties respectfully request an adjournment of the settlement conference and stay of proceedings up to and including September 30, 2022.

This timeframe will enable the Parties to schedule and complete a mediation. The Parties are in the process of selecting and engaging the services of an experienced mediator. The Parties will submit a joint status report following the conclusion of their mediation as to the status of the case.

This is the Parties’ first request to stay proceedings in this case and adjourn the settlement conference. All Parties consent to the request. This request is being made 40 days prior to the settlement conference. No other deadlines will be impacted by this request. This request for a stay of proceedings and adjournment of the settlement conference is made in good faith and with no intention of delay.

We thank the Court for its time and attention.

Sincerely,

BENESCH, FRIEDLANDER,
COPLAN & ARONOFF LLP



Laura E. Kogan

BURSOR & FISHER, P.A.

/s/ Joseph Ignatius Marchese

Joseph Ignatius Marchese